

FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MAY 12 2025

SEAN F. MCAVOY, CLERK

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YAKIMA, WASHINGTON

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

1:24-CR-2055-MKD

Plaintiff.

**PLEA AGREEMENT ADDENDUM
RE: FORFEITURE**

VS

LELAND JAMES VIJARRO.

Defendant

Plaintiff, United States of America, by and through Vanessa R. Waldref,

United States Attorney for the Eastern District of Washington, Bree H. Black

Horse, Assistant United States Attorney for the Eastern District of Washington.

and Defendant LEI AND JAMES VILLARO (hereinafter "Defendant" and/or

"LEI AND JAMES VIARRO" and Defendant's counsel, Federal Defender Nick

Minor errors to the following code add up to the Blame. A more complete

The Defendant, LELAND JAMES VIJARRO, agrees to the following, with respect to criminal judicial forfeiture:

1 Defendant agrees to voluntarily forfeit and relinquish all right, title and
2 interest he has in the following listed assets to the United States:
3

- 4 - a Springfield Armory model 1911, .45 caliber pistol bearing serial number
5 NM574777

6 Defendant acknowledges that the firearm listed above is subject to forfeiture
7 to the United States pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), as
8 property involved in or facilitating the Using, Carrying, Brandishing and
9 Discharging a Firearm During and In Relation To A Crime of Violence (Count 5),
10 in violation of 18 U.S.C. § 924(c)(1)(A)(iii), to which Defendant is pleading guilty.

11 Defendant agrees to take all steps as requested by the United States to pass
12 clear title to the assets to the United States and to testify truthfully in any forfeiture
13 proceeding. Defendant agrees to hold all law enforcement agents and the United
14 States, its agents, and its employees harmless from any claims whatsoever arising
15 in connection with the seizure, abandonment, or forfeiture of any asset covered by
16 this agreement.
17

18 Defendant further agrees to waive all constitutional and statutory challenges
19 in any manner (including direct appeal, habeas corpus, or any other means) to any
20 forfeiture carried out in accordance with this Plea Agreement on any grounds,
21 including that the forfeiture constitutes an excessive fine or punishment. Defendant
22 knowingly and voluntarily waives his right to a jury trial on the forfeiture of the
23
24
25
26
27
28

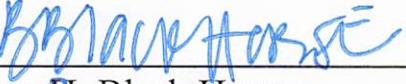
1 assets. Defendant waives oral pronouncement of forfeiture at the time of
2 sentencing, and any defects that may pertain to the forfeiture.
3

4 Defendant waives further notice of any federal, state or local proceedings
5 involving the forfeiture of the seized assets the Defendant is agreeing to forfeit in
6 this Plea Agreement.
7

8 Approvals and Signatures

9 Agreed and submitted on behalf of the United States Attorney's Office for the
10 Eastern District of Washington.

11 Richard R. Barker
12 Acting
13 United States Attorney

14 
15 Bree H. Black Horse

16 Assistant U.S. Attorney

17 
18 05.12.2025

19 Date

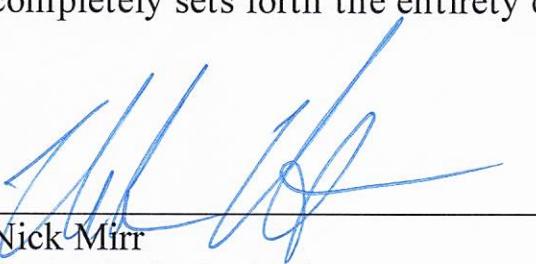
20 I have read this Plea Agreement Addendum and have carefully reviewed and
21 discussed every part of the agreements with my attorney. I understand and
22 voluntarily enter into the Plea Agreement Addendum. Furthermore, I have
23 consulted with my attorney about my rights, I understand those rights, and I am
24 satisfied with the representation of my attorney in this case. No other promise or
25 inducements have been made to me, other than those contained in this Plea
26 Agreement Addendum and no one has threatened or forced me in any way to enter
27 into this Plea Agreement Addendum.
28


LELAND JAMES VIJARRO
Defendant


5-12-25

Date

1 I have read the Plea Agreement Addendum and have discussed the contents
2 of the agreement with my client. The Plea Agreement Addendum accurately and
3 completely sets forth the entirety of the agreement between the parties.
4

5 
6 _____
7 Nick Mirr
8 Attorney for Defendant

5/12/25
9 _____
10 Date